



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

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SME  
F. #2019R01145

*271 Cadman Plaza East  
Brooklyn, New York 11201*

October 9, 2020

By ECF

The Honorable Pamela K. Chen  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re:    United States v. Bo Mao  
Criminal Docket No. 19-00392 (PKC)

Dear Judge Chen:

The parties write jointly to request that the status conference scheduled for October 12, 2020 be rescheduled to November 12, 2020 at 11:00 a.m., a date we understand is convenient to both the parties and the Court. This case has previously been deemed complex, and the parties respectfully request that the Court exclude time through the date of the next status conference. See ECF Docket Entry Dated June 1, 2020.

The parties continue to discuss certain pretrial issues, and therefore respectfully request a two-week adjournment of the current deadlines for (1) briefing related to pre-trial motions; (2) the government's submission pursuant to Section 4 of the Classified Information Procedures Act, 18 U.S.C. app. III (the "CIPA 4 submission"); and (3) expert disclosures. The revised schedule would be:

- Pretrial motions due on October 30, 2020, responses due on November 27, 2020, and replies due on December 30, 2020
- CIPA 4 submission due on November 13, 2020
- Government's expert disclosure due on November 16, 2020, and defendant's expert disclosure due on December 14, 2020.

Respectfully submitted,  
SETH D. DUCHARME  
Acting United States Attorney

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Cc: Defense counsel (by ECF)